

REMARKS/ARGUMENTS

Claims 10-21 are pending in the application. Claims 10 and 16 are amended.

Claims 10, 13-16 and 19-21 are rejected under 35 U.S.C. § 102(a), as being anticipated by Shiraishi et al. (JP 2002-074870), hereinafter (“Shiraishi”). Claims 11-12 and 17-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shiraishi et al. (JP 2002-074870), hereinafter (“Shiraishi”).

Applicants submit the cited reference Shiraishi does not teach, suggest or describe at least an actuator component comprising, among other things, at least one conductive material layer and at least one insulative material layer to be applied to an actuator finger one layer upon another in an alternating manner wherein the last layer applied is a conductive material layer, the last conductive material layer comprising a gap, and wherein a first bonding pad is placed in the gap of the last conductive material layer, and a second bonding pad and a third bonding pad are placed on opposite ends of the actuator finger (*e.g.*, as described in claim 10).

The Office Action asserts that Shiraishi teaches an electrically insulative material (including 60 above lower-most 61), a conductive material (citing element 61) and an actuator finger (52a), citing Figure 6. It also asserts Shiraishi teaches sandwiching a conductive layer between the insulating layer and said actuator finger, citing Figures 5-6. *See* Office Action dated 2/3/2006, paragraph 4. Applicants disagree for at least the reasons described in previous responses.

Moreover, Applicants submit the cited reference also fails to teach or suggest the newly amended limitations of claim 10. In particular, the cited Shiraishi reference fails to teach or

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suggest at least an embodiment with 1) a last conductive material layer comprising a gap 2) a first bonding pad is placed in the gap of the last conductive material layer, and 3) a second bonding pad and a third bonding pad are placed on opposite ends of the actuator finger (*e.g.*, as described in claim 10). *See e.g.*, Cited Figures 5 and 6 of Shiraishi. The description of Shiraishi reference fails to teach or suggest such limitations as well. Applicants respectfully request reconsideration and withdrawal of the current §102 and §103 rejections.

Moreover, Applicants submit independent claim 10 is allowable. Independent claim 16 includes similar limitations and therefore is allowable as well. Claims 11-15 and 17-21 depend from allowable independent claims, and therefore are allowable as well.

The Applicant respectfully submits that this application is in condition for allowance. A Notice of Allowance is earnestly solicited. The Examiner is invited to contact the undersigned at (408) 975-7500 to discuss any matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. §1.16 or §1.17 to Deposit Account No. **11-0600**.

Respectfully submitted

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